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March 7, 1997

Mr. Edward J. Boyle  
Remedial Project Manager  
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Naval Facilities Engineering Command  
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### RE: Off-Site Well Installation

Dear Mr. Boyle:

I am in receipt of your letter of February 10, 1997. By that letter the Navy seeks access to General Motor's ("GM") facility to collect additional data before responding to GM's request for the placement by the Navy of additional off-site monitoring wells. GM finds the Navy's continued refusal to fully delineate the downgradient extent of its TCE plume, unacceptable. Existing data generated by the Navy, the USGS and GM unequivocally establishes the need to undertake such an investigation. TCE contamination found on the Navy facility is orders of magnitude higher than that found in monitoring wells located on the GM property. In addition, the GM property is hydraulically downgradient of the Navy facility, and the fracture trace study performed by Geovation establishes a hydraulic connection between those two facilities, notwithstanding the USGS's finding of a purported confining unit.

Moreover, none of the investigative activities proposed in your letter need to be accomplished before the Navy can commit to implement an off-site investigation encompassing the GM

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facility. Indeed, while the data generated by those activities would be helpful in selecting well locations and setting their respective depths, they are irrelevant to the issue of whether the Navy should commit to the implementation of such an off-site study. That study is warranted both from a technical and regulatory standpoint. Relevant regulations require full delineation of the TCE plume--something which the Navy has not yet accomplished, notwithstanding the age of the project and GM's repeated requests for such an investigation.

Finally, the Navy's on-site investigation (no matter how thorough) will not address dispositively the issue of plume delineation; off-site wells placed in the areas identified in Geovations fracture trace analysis are needed for that purpose.

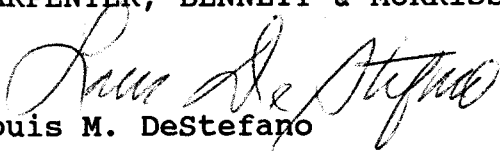
Given the above, GM does not believe it appropriate to grant the Navy's request for access to its site, unless and until, the Navy agrees to drill some number of downgradient wells as discussed in our meeting with NJDEP in December, 1996. The location and depth of those wells can await development of the data set out in your letter.

In that regard, you recently have advised me that the Navy may reconsider its position following USGS's performance of its own fracture trace analysis. If that analysis confirms the findings contained in the Geovation report, then the Navy may be willing to commit to the installation of additional off-site wells. It is my understanding that a decision on that issue would be made by the end of the month.

Please call me if you wish to discuss this matter further.

Very truly yours,

CARPENTER, BENNETT & MORRISSEY

  
Louis M. DeStefano

LMDeS/mbm